

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

<div>IN RE: NORTH SEA BRENT CRUDE OIL FUTURES LITIGATION</div> <div>This document applies to: ALL CASES</div>	1:13-md-02475 (ALC)
<div>KEVIN McDONNELL, ANTHONY INSINGA, ROBERT MICHIELS and JOHN DEVIVO, on behalf of themselves and all others similarly situated,</div> <div style="text-align: right;">Plaintiffs,</div> <div style="text-align: center;">v.</div> <div>ROYAL DUTCH SHELL PLC, BP PLC, STATOIL ASA, MORGAN STANLEY, TRAFIGURA BEHEER B.V., TRAFIGURA AG, PHIBRO TRADING LLC, VITOL, S.A. and JOHN DOES 1-50,</div> <div style="text-align: right;">Defendants.</div>	Case No. 13-cv-07089 (ALC) ECF Case
<div>NEIL TAYLOR, on behalf of himself and all others similarly situated,</div> <div style="text-align: right;">Plaintiff,</div> <div style="text-align: center;">v.</div> <div>ROYAL DUTCH SHELL PLC, BP PLC, STATOIL ASA, MORGAN STANLEY, TRAFIGURA BEHEER B.V., TRAFIGURA AG, PHIBRO TRADING LLC, VITOL, S.A., and JOHN DOES 1-50,</div> <div style="text-align: right;">Defendants.</div>	Case No. 13 Civ. 8179 (ALC) ECF Case

**NOTICE OF MOTION OF PLAINTIFFS KEVIN MCDONNELL, ANTHONY
INSINGA, ROBERT MICHIELS, JOHN DEVIVO AND NEIL TAYLOR TO BE
APPOINTED LEAD PLAINTIFFS AND TO APPOINT
KIRBY MCINERNEY LLP AS INTERIM LEAD COUNSEL**

PLEASE TAKE NOTICE that upon the accompanying Memorandum of Law in Support of Motion of Plaintiffs Kevin McDonnell, Anthony Insinga, Robert Michiels, John Devivo and Neil Taylor To Be Appointed Lead Plaintiffs and To Appoint Kirby McInerney LLP as Interim Lead Counsel, dated January 24, 2014, filed in support thereof, oral argument, and other such materials as the Court may consider, Kirby McInerney LLP, on behalf of Plaintiffs Kevin McDonnell, Anthony Insinga, Robert Michiels, John Devivo and Neil Taylor (the “Trader Plaintiffs”) will move this Court before the Honorable Andrew L. Carter, Jr. at the United States Courthouse for the Southern District of New York, Thurgood Marshall Courthouse, 40 Foley Square, Courtroom 1306, for an order pursuant to Fed. R. Civ. P. 23 appointing Kirby McInerney LLP as Interim Lead Counsel and appointing the Trader Plaintiffs as Lead Plaintiffs the above-captioned matter.

Plaintiffs’ counsel has previously conferred with opposing parties and made a good faith effort to resolve the matter of appointment of Interim Lead Counsel without Court action.

Dated: New York, New York
January 24, 2014

KIRBY McINERNEY LLP

/s/ David E. Kovel

David E. Kovel

Alice McInerney (*Of Counsel*)

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